



April 20, 2023

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

VIA ECF ONLY

Re: *Coker v Goldberg & Associates P.C.* 1:21-cv-1803-JLR  
PROPOSED BRIEFING SCHEDULE FOR PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Your Honor:

Pursuant to your Order dated April 12, 2023 [Dkt. 75], we hereby submit the following proposed briefing schedule for Plaintiff's Motion for Summary Judgment:

June 23, 2023 - Plaintiff's Motion for Summary Judgment Due

3 weeks after motion – Defendants' Response to Plaintiff's Motion for Summary Judgment Due

2 weeks after response - Plaintiff's Reply to Defendants' Response Due

I am asking for more time than is typical to initiate the process due to the extenuating personal circumstances I have previously mentioned. My hope is to get it in before the June 23, 2023 deadline but these days I particularly appreciate building in flexibility where possible, just in case.

Also, I intend to file a separate letter motion regarding Defendants' recent discovery production pursuant to the Orders at Dkt. 73. Based on certain deficiencies I intend to ask the Court to make certain inferences against Defendants and/or for other sanctions, which may have bearing on the summary judgment analysis. I intend to file this by no later than April 28. Thank you.

Sincerely,

Penn Dodson, Esq.

[penn@andersondodson.com](mailto:penn@andersondodson.com)

**ANDERSONDODSON, P.C.**

11 BROADWAY, SUITE 615 | NEW YORK, NEW YORK 10004  
14143 DENVER WEST PARKWAY | SUITE 100-50 | GOLDEN, COLORADO 80401  
TEL: (212) 961-7639 | FAX: (646) 998-8051  
[WWW.ANDERSONDODSON.COM](http://WWW.ANDERSONDODSON.COM)